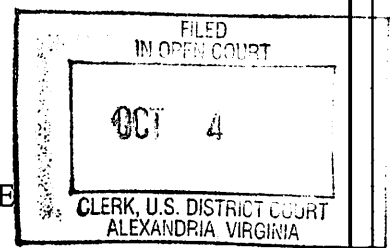


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division



UNITED STATES OF AMERICA

v.

HARES FAKOOR,

Defendant.

Criminal Case No. 1:18-CR-355

Count 1: Receipt of Child Pornography  
(18 U.S.C. § 2252(a)(2) and (b)(1))

Count 2: Possession of Child Pornography  
(18 U.S.C. § 2252(a)(4)(B) and (b)(2))

Forfeiture Notice: 18 U.S.C. § 2253(a)(2)-(3)

**INDICTMENT**

October 2018 Term—at Alexandria, Virginia

**COUNT ONE:**

(Receipt of Child Pornography)

THE GRAND JURY CHARGES THAT:

Between in or about January 2016 and in or about May 2016, in Aldie, Virginia, within the Eastern District of Virginia, the defendant, HARES FAKOOR, attempted to and did knowingly receive visual depictions using any means and facility of interstate and foreign commerce and that have been mailed, and have been shipped and transported in and affecting interstate and foreign commerce, and which contain materials which have been mailed and so shipped and transported, by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which visual depictions were of such conduct, to wit: digital visual depictions received via an HP Envy 700 PC Desktop computer, S/N MXX5190M41, with a 2TB Toshiba desktop hard drive, S/N Z46Y46UAS, but not including any digital visual depictions within a folder on that HP Envy 700 PC computer entitled “\Users\Hares\Desktop\Hares Transfer\Nn\_Models” or any subfolders thereof.

(All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).)

**COUNT TWO:**  
(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

Between in or about July 2015 and in or about May 2016, in Aldie, Virginia, within the Eastern District of Virginia, the defendant, HARES FAKOOR, attempted to and did knowingly possess one or more books, magazines, periodicals, films, video tapes, and other matters which contain visual depictions that have been mailed, and have been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials which have been mailed and so shipped and transported, by an means, including by computer, the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: digital visual depictions contained on an HP Envy 700 PC Desktop computer, S/N MXX5190M41, with a 2TB Toshiba desktop hard drive, S/N Z46Y46UAS, within a folder entitled “\Users\Hares\Desktop\Hares Transfer\Nn\_Models” and its subfolders.

(All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).)

### **FORFEITURE NOTICE**

The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, HARES FAKOOR, has an interest.

Under Federal Rule of Criminal Procedure 32.2(a), the defendant, HARES FAKOOR, is hereby notified that, if convicted of committing the offenses alleged in the Indictment, he shall forfeit to the United States under 18 U.S.C. § 2253(a)(2) and (a)(3), any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110, any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense, and any property, real or personal, used or intended to be used to commit or promote the commission of such offense or property traceable to such property. This property includes, but is not limited to: an HP Envy 700 PC desktop computer, S/N MXX5190M41, containing a 2TB Toshiba desktop hard drive, S/N Z46Y46UAS.

If property subject to forfeiture is not available, the government may seek an order forfeiting substitute assets.

A TRUE BILL

Pursuant to the E-Government Act,,  
The original of this page has been filed  
under seal in the Clerk's Office

\_\_\_\_\_  
DATE

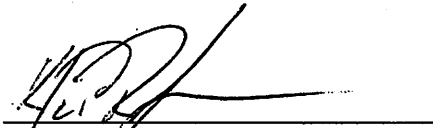
\_\_\_\_\_  
FOREPERSON

G. Zachary Terwilliger  
United States Attorney

By:



William G. Clayman  
Special Assistant United States Attorney (LT)



Kyle P. Reynolds  
Special Assistant United States Attorney (LT)